

EXHIBIT 1

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

*County of Summit, Ohio, et al. v. Purdue Pharma
L.P., et al.*

Case No. 1:18-op-45090

*The County of Cuyaboga v. Purdue Pharma L.P., et
al., Case No. 17-op-45004*

MDL NO. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

DECLARATION OF CHARLES J. CRUEGER

I, Charles J. Crueger, declare and state as follows:

1. I am an attorney with the law firm of Crueger Dickinson LLC and am one of the attorneys representing Plaintiffs in the above captioned case. I submit this declaration in support of *Motion of Plaintiffs Counties Of Cuyaboga And Summit For Partial Summary Adjudication Regarding Plaintiffs' Equitable Claims For Abatement Of An Absolute Public Nuisance*.

2. Attached hereto as Exhibit 2 is a true and correct copy of the Centers for Disease Control and Prevention press briefing transcript dated March 15, 2016.

3. Attached hereto as Exhibit 3 is a true and accurate copy of Bates No. SUMMIT_001084697 produced by Summit County in this litigation.

4. Attached hereto as Exhibit 4 is a true and accurate copy of Bates No. SUMMIT_001266515 produced by Summit County in this litigation.

5. Attached hereto as Exhibit 5 is a true and correct copy of WKYC 3 news article titled *Mobile Morgue Trailer Brought into Summit County to Deal with Surge of Overdoses*.

6. Attached hereto as Exhibit 6 is a true and accurate copy of Bates No. SUMMIT_001191836 produced by Summit County in this litigation.

7. Attached hereto as Exhibit 7 is a true and accurate copy of Bates No. SUMMIT_001020273 produced by Summit County in this litigation.

8. Attached hereto as Exhibit 8 is a true and accurate copy of Mental Health and Addiction Services' Unduplicated Admissions for Opiate Abuse and Dependence.

9. Attached hereto as Exhibit 9 is a true and accurate copy of Bates No. SUMMIT_001090233 produced by Summit County in this litigation.

10. Attached hereto as Exhibit 10 is a true and accurate copy of Mental Health and Addiction Services' Naloxone Administration in Ohio.

11. Attached hereto as Exhibit 11 is a true and accurate copy of Bates No. SUMMIT_001215295 produced by Summit County in this litigation.

12. Attached hereto as Exhibit 12 is a true and accurate copy of Bates No. SUMMIT_000043050 produced by Summit County in this litigation.

13. Attached hereto as Exhibit 13 is a true and accurate copy of Bates No. SUMMIT_002052855 produced by Summit County in this litigation.

14. Attached hereto as Exhibit 14 is a true and accurate copy of Bates No. SUMMIT_000004286 produced by Summit County in this litigation.

15. Attached hereto as Exhibit 15 is a true and accurate copy of Bates No. SUMMIT_000087384 produced by Summit County in this litigation.

16. Attached hereto as Exhibit 16 is a true and accurate copy of Bates No. CUYAH_014188900 produced by Cuyahoga County in this litigation.

17. Attached hereto as Exhibit 17 is a true and accurate copy of Bates No. CUYAH_000018578 produced by Cuyahoga County in this litigation.

18. Attached hereto as Exhibit 18 is a true and accurate copy of Bates No. SUMMIT_001631090 produced by Summit County in this litigation.

19. Attached hereto as Exhibit 19 is a true and accurate copy of Bates No. CUYAH_014361009 produced by Cuyahoga County in native format in this litigation.

20. Attached hereto as Exhibit 20 is a true and accurate copy of Bates No. CUYAH_014362277 produced by Cuyahoga County in this litigation.

21. Attached hereto as Exhibit 21 is a true and accurate copy of Bates No. CUYAH_001397330 produced by Cuyahoga County in native format in this litigation.

22. Attached hereto as Exhibit 22 is a true and accurate copy of Bates No. CUYAH_002351018 produced by Cuyahoga County in this litigation.

23. Attached hereto as Exhibit 23 is a true and accurate copy of Bates No. CUYAH_002462640 produced by Cuyahoga County in this litigation.

24. Attached hereto as Exhibit 24 is a true and accurate copy of Bates No. CUYAH_002462920 produced by Cuyahoga County in this litigation.

25. Attached hereto as Exhibit 25 is a true and accurate copy of Bates No. CUYAH_002462638 produced by Cuyahoga County in this litigation.

26. Attached hereto as Exhibit 26 is a true and accurate copy of Bates No. CUYAH_002462641 produced by Cuyahoga County in this litigation.

27. Attached hereto as Exhibit 27 is a true and accurate copy of Bates No. CUYAH_002467830 produced by Cuyahoga County in this litigation.

28. Attached hereto as Exhibit 28 is a true and accurate copy of Bates No. CUYAH_002486141 produced by Cuyahoga County in this litigation.

29. Attached hereto as Exhibit 29 is a true and accurate copy of Bates No. CUYAH_003505168 produced by Cuyahoga County in this litigation.

30. Attached hereto as Exhibit 30 is a true and accurate copy of Bates No. CAH_MDL2408_03347608 produced by Cardinal Health in this litigation.

31. Attached hereto as Exhibit 31 is a true and accurate copy of Bates No. CAH_MDL2408_03389325 produced by Cardinal Health in this litigation.

32. Attached hereto as Exhibit 32 is a true and accurate copy of Bates No. SUMMIT_000043688 produced by Summit County in this litigation.

33. Attached hereto as Exhibit 33 is a true and accurate copy of Bates No. SUMMIT_000278683 produced by Summit County in this litigation.

34. Attached hereto as Exhibit 34 is a true and accurate copy of Bates No. SUMMIT_000077565 produced by Summit County in native format in this litigation.

35. Attached hereto as Exhibit 35 is a true and accurate copy of Bates No. HDS_MDL_00249031 produced by H. D. Smith in this litigation.

36. Attached hereto as Exhibit 36 is a true and accurate copy of Bates No. HDS_MDL_00408069 produced by H. D. Smith in this litigation.

37. Attached hereto as Exhibit 37 is a true and accurate copy of Cardinal Health's Opioid Action Program webpage.

38. Attached hereto as Exhibit 38 is a true and accurate copy of Bates No. HDS_MDL_00447518 produced by H. D. Smith in this litigation.

39. Attached hereto as Exhibit 39 is a true and accurate copy of Bates No. ABDCMDL00153373 produced by AmerisourceBergen in this litigation.

40. Attached hereto as Exhibit 40 is a true and accurate copy of Bates No. MNK-T1_0000179105 produced by Mallinckrodt in this litigation.

41. Attached hereto as Exhibit 41 is a true and accurate copy of Henry Schein's Secure Schedule II Management Tools for Healthcare Providers webpage.

42. Attached hereto as Exhibit 42 is a true and accurate copy of Bates No. MNK-T1_0001332076 produced by Mallinckrodt in this litigation.

43. Attached hereto as Exhibit 43 is a true and accurate copy of Bates No. TEVA_MDL_A_01204074 produced by Teva in this litigation.

44. Attached hereto as Exhibit 44 is a true and accurate copy of Bates No. TEVA_MDL_A_09183248 produced by Teva in this litigation.

45. Attached hereto as Exhibit 45 is a true and accurate copy of Summit County Public Health, Dashboard for Estimated Overdose Emergency Room Department Visits 2016-2019.

46. Attached hereto as Exhibit 46 is a true and accurate copy of Nate Hartle's August 1, 2018 deposition exhibit number 42.

47. Attached hereto as Exhibit 47 is a true and accurate copy of Gary Boggs' deposition exhibit number 9.

48. Attached hereto as Exhibit 48 is a true and accurate copy of document 1233-4 filed on January 8, 2019.

49. Attached hereto as Exhibit 49 is a true and accurate copy of Deborah Bearer's deposition exhibit number 19.

50. Attached hereto as Exhibit 50 is a true and accurate copy of Deborah Bearer's deposition exhibit number 20.

51. Attached hereto as Exhibit 51 is a true and accurate copy of Thomas Gilson's 30(b)(6) deposition exhibit number 10.

52. Attached hereto as Exhibit 52 is a true and accurate copy of Donna Skoda's deposition.

53. Attached hereto as Exhibit 53 is a true and accurate copy of Lisa Kohler's deposition.

54. Attached hereto as Exhibit 54 is a true and accurate copy of Clarence Tucker's deposition.

55. Attached hereto as Exhibit 55 is a true and accurate copy of Kim Patton's deposition.

56. Attached hereto as Exhibit 56 is a true and accurate copy of Julie Barnes' deposition.

57. Attached hereto as Exhibit 57 is a true and accurate copy of Greta Johnson's 30(b)(6) deposition.

58. Attached hereto as Exhibit 58 is a true and accurate copy of Jeffrey Sturmi's deposition.

59. Attached hereto as Exhibit 59 is a true and accurate copy of Gerald Craig's deposition.

60. Attached hereto as Exhibit 60 is a true and accurate copy of Charles Twigg's deposition.

61. Attached hereto as Exhibit 61 is a true and accurate copy of Thomas Gilson's 30(b)(6) deposition.

62. Attached hereto as Exhibit 62 is a true and accurate copy of Hugh Shannon's 30(b)(6) deposition.

63. Attached hereto as Exhibit 63 is a true and accurate copy of Margaret Keenan's deposition.

64. Attached hereto as Exhibit 64 is a true and accurate copy of Molly Leckler's deposition.

65. Attached hereto as Exhibit 65 is a true and accurate copy of Trevor McAleer's deposition.

66. Attached hereto as Exhibit 66 is a true and accurate copy of Nate Hartle's July 31, 2018 deposition.

67. Attached hereto as Exhibit 67 is a true and accurate copy of Nate Hartle's August 1, 2018 deposition.

68. Attached hereto as Exhibit 68 is a true and accurate copy of Gary Boggs' January 17, 2019 deposition.

69. Attached hereto as Exhibit 69 is a true and accurate copy of Jennifer Norris' deposition.

70. Attached hereto as Exhibit 70 is a true and accurate copy of Mark Hartman's deposition.

71. Attached hereto as Exhibit 71 is a true and accurate copy of Shawn Abreu's deposition.

72. Attached hereto as Exhibit 72 is a true and accurate copy of Jeff Peacock's deposition.

73. Attached hereto as Exhibit 73 is a true and accurate copy of Susanne Hiland's 30(b)(6) deposition.

74. Attached hereto as Exhibit 74 is a true and accurate copy of Jeff Abernathy's deposition.

75. Attached hereto as Exhibit 75 is a true and accurate copy of Miranda Johnson's deposition.

76. Attached hereto as Exhibit 76 is a true and accurate copy of Jolynn Coleman's deposition.

77. Attached hereto as Exhibit 77 is a true and accurate copy of Ramona Sullins's deposition.

78. Attached hereto as Exhibit 78 is a true and accurate copy of George Chapman's deposition.

79. Attached hereto as Exhibit 79 is a true and accurate copy of Roxanne Reed's deposition.

80. Attached hereto as Exhibit 80 is a true and accurate copy of Debbie Hodges' deposition.

81. Attached hereto as Exhibit 81 is a true and accurate copy of Susanne Hiland's Fact deposition.

82. Attached hereto as Exhibit 82 is a true and accurate copy of Art Morelli's deposition.

83. Attached hereto as Exhibit 83 is a true and accurate copy of Karen Harper's deposition.

84. Attached hereto as Exhibit 84 is a true and accurate copy of Victor Borelli's deposition.

85. Attached hereto as Exhibit 85 is a true and accurate copy of William Ratliff's deposition.

86. Attached hereto as Exhibit 86 is a true and accurate copy of Erin Cox's deposition.

87. Attached hereto as Exhibit 87 is a true and accurate copy of Stacey Chick's deposition.

88. Attached hereto as Exhibit 88 is a true and accurate copy of Steven Becker's deposition.

89. Attached hereto as Exhibit 89 is a true and accurate copy of Cathy Jackson's deposition.

90. Attached hereto as Exhibit 90 is a true and accurate copy of Michael Wessler's deposition.

91. Attached hereto as Exhibit 91 is a true and accurate copy of Lisa Cardetti's deposition.

92. Attached hereto as Exhibit 92 is a true and accurate copy of Eileen Spaulding's deposition.

93. Attached hereto as Exhibit 93 is a true and accurate copy of George Saffold's deposition.

94. Attached hereto as Exhibit 94 is a true and accurate copy of Tiffany Rowley-Kilper's deposition.

95. Attached hereto as Exhibit 95 is a true and accurate copy of Bonnie New's deposition.

96. Attached hereto as Exhibit 96 is a true and accurate copy of Richard Fannelli's vol. I-II depositions.

97. Attached hereto as Exhibit 97 is a true and accurate copy of Kathe Sackler's deposition.

98. Attached hereto as Exhibit 98 is a true and accurate copy of Deborah Bearer's deposition.

99. Attached hereto as Exhibit 99 is a true and accurate copy of Lisa Walker's deposition.

100. Attached hereto as Exhibit 100 is a true and accurate copy of Paul Campanelli's deposition.

101. Attached hereto as Exhibit 101 is a true and accurate copy of George Stevenson's deposition.

102. Attached hereto as Exhibit 102 is a true and accurate copy of Brian Lortie's vol. I-III depositions.

103. Attached hereto as Exhibit 103 is a true and accurate copy of Stephens Macrides' deposition.

104. Attached hereto as Exhibit 104 is a true and accurate copy of Katherine Keyes' declaration.

105. Attached hereto as Exhibit 105 is a true and accurate copy of Scott Wexelblatt's declaration.

106. Attached hereto as Exhibit 106 is a true and accurate copy of Caleb Alexander's declaration.

107. Attached hereto as Exhibit 107 is a true and accurate copy of Jeffrey Liebman's declaration.

108. Attached hereto as Exhibit 108 is a true and accurate copy of Steven Mills' fact deposition.

109. Attached hereto as Exhibit 109 is a true and accurate copy of Edward Bratton's fact deposition.

110. Attached hereto as Exhibit 110 is a true and accurate copy of Rex Swords deposition.

111. Attached hereto as Exhibit 111 is a true and accurate copy of Bates No. WAGMDL00114603 produced by Walgreens in this litigation.

112. Attached hereto as Exhibit 112 is a true and accurate copy of Christopher Dymon's fact deposition.

113. Attached hereto as Exhibit 113 is a true and accurate copy of Bates No. WAGMDL00334472 produced by Walgreens in this litigation.

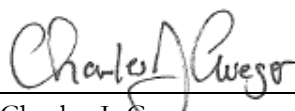
114. Attached hereto as Exhibit 114 is a true and accurate copy of Bates No. WAGMDL00608996 produced by Walgreens in this litigation.

115. Attached hereto as Exhibit 115 is a true and accurate copy of Bates No. WAGMDL00035671 produced by Walgreens in this litigation.

116. Attached hereto as Exhibit 116 is a true and accurate copy of Eric Stahmann's fact deposition.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 28th day of June 2019.

By: 
Charles J. Crueger